

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:)	
MERLYN Y. SEARS,)	CASE NO.: 24-12162-amc
)	CHAPTER 13
DEBTOR.)	JUDGE ASHELY M. CHAN
)	
THE BANK OF NEW YORK MELLON FKA)	
THE BANK OF NEW YORK, AS TRUSTEE)	
FOR THE CERTIFICATEHOLDERS OF)	
THE CWABS, INC., ASSET-BACKED)	
CERTIFICATES, SERIES 2006-14)	
)	
CREDITOR)	
)	
MERLYN Y. SEARS, DEBTOR,)	
AND SCOTT F. WATERMAN, TRUSTEE)	
)	
RESPONDENTS)	

OBJECTION TO CONFIRMATION OF PLAN

COMES NOW, The Bank of New York Mellon FKA The Bank of New York, as Trustee for the certificateholders of the CWABS, Inc., Asset-Backed Certificates, Series 2006-14, (“Secured Creditor”) by and through its undersigned attorneys, and for its Objection to Confirmation of Debtors Chapter 13 Plan, herein states and alleges as follows:

1. This Court has exclusive jurisdiction over this proceeding. Debtor filed this Petition under Chapter 13 of the United States Bankruptcy Code on or about June 24, 2024 and confirmation is pending with the Court.
2. Secured Creditor holds a lien over Debtor’s property described as 2112 North 11th, Philadelphia, PA 19122.
3. As of the date of filing this Objection to Confirmation, Secured Creditor’s estimated secured claim is \$74,208.81 and the underlying loan matures on February 1, 2061. Secured Creditor

will file its Proof of Claim by the bar date of September 2, 2024, with the approximate arrears of \$24,352.86, which is above the arrearage of \$18,000.00 listed on Debtor's Plan.

3. Therefore, the plan fails 11 U.S.C. §1322 (b)(2)-(3), and pursuant to 11 U.S.C. §1325 (a)(5) the plan cannot be confirmed.

WHEREFORE, The Bank of New York Mellon FKA The Bank of New York, as Trustee for the certificateholders of the CWABS, Inc., Asset-Backed Certificates, Series 2006-14, prays that its Objection to Confirmation of Plan be sustained, and for all further relief as is just and proper.

Respectfully submitted,

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq
Pennsylvania Bar # 205047
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
josh.goldman@padgettlawgroup.com
Counsel for Creditor

CERTIFICATE OF SERVICE

I hereby certify that on or before August 20, 2024, I caused a true and correct copy of the foregoing to be served either by CM/ECF notice to those so authorized, and first-class mail as indicated to the parties reflected below.

VIA U.S. MAIL

DEBTOR
MERLYN Y SEARS
2112 N. 11TH STREET
PHILADELPHIA, PA 19122

VIA ELECTRONIC NOTICE

ATTORNEYS FOR DEBTOR
BRAD J. SADEK
SADEK LAW OFFICES, LLC
1500 JFK BOULEVARD
STE 220
PHILADELPHIA, PA 19102
BRAD@SADEKLAW.COM

TRUSTEE
SCOTT F. WATERMAN [CHAPTER 13]
CHAPTER 13 TRUSTEE
2901 ST. LAWRENCE AVE.
SUITE 100
READING, PA 19606
ECFMAIL@READINGCH13.COM

U.S. TRUSTEE
UNITED STATES TRUSTEE
OFFICE OF UNITED STATES TRUSTEE
ROBERT N.C. NIX FEDERAL BUILDING
900 MARKET STREET, SUITE 320
PHILADELPHIA, PA 19107
USTPREGION03.PH.ECF@USDOJ.GOV

Respectfully submitted,

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq
Pennsylvania Bar # 205047

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Tallahassee, FL 32312
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josh.goldman@padgettlawgroup.com
Counsel for Creditor